UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

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DR. ROBERT LEDERER,

Plaintiff,

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V.

CIVIL ACTION NO. 04-10284-NG

JOHN SNOW, INC. and

THE JOHN HOPKINS UNIVERSITY/ CENTER FOR COMMUNICATION

PROGRAM,

Defendants.

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JOINT PROPOSED PRETRIAL SCHEDULE

Pursuant to Fed. R. Civ. P. 16(b) and Local Rule 16.1, and in accordance with this Court's Order of April 1, 2004, counsel for the parties have conferred and jointly agree upon and respectfully propose the following pretrial schedule:

June 4, 2004 Local Rule 26.2 Automatic Document Disclosure

February 11, 2005 All Discovery Completed

March 11, 2005 Dispositive Motions Filed

April 8, 2005 Oppositions to Motions Filed

May, 2005 Final Pretrial Conference

The Plaintiff, By his attorney

/s/ David B. Stein

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Johns Hopkins University/ Center for Communication Programs, By their attorney,

/s/ John F. Rooney, III

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John Snow, Inc. By their attorney,

/s/ Andrew F. Caplan

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Dated: April 27, 2004